

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

THOMAS GORCZYNSKI, on behalf  
of himself and all others similarly  
situated,

Plaintiff,

v.

ELECTROLUX HOME PRODUCTS,  
INC., et al.,

Defendants.

Civil No. 18-10661-RMB-KMW

**PLAINTIFF’S UNOPPOSED MOTION TO FILE PLAINTIFF’S  
MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF’S MOTION  
FOR CLASS CERTIFICATION AND CERTAIN EXHIBITS UNDER SEAL**

Plaintiff, Thomas Gorczynski, by and through his counsel, hereby respectfully moves to file under seal his Memorandum of Law in Support of Motion for Class Certification and Certain Exhibits pursuant to Local Rule 5.3 and the Stipulated Protective Order entered by the Court in this case (ECF No. 40). Plaintiff avers as follows in support of this Unopposed Motion:

On September 12, 2018, this Court entered an Order (ECF No. 40) approving and adopting the parties’ Stipulated Protective Order (ECF No. 39) (“the Stipulation”). Plaintiff’s Memorandum of Law in Support of Plaintiff’s Motion for Class Certification and Certain Exhibits makes reference to the contents of

documents that have been designated as “Confidential” or “Highly Confidential,” as those terms are defined in the parties’ Stipulation. Pursuant to the Court’s Order and the parties’ Stipulation, Plaintiff is required to file these materials under seal. ECF No. 40, ¶12. Accordingly, a redacted version of the Memorandum of Law in Support of Motion for Class Certification will be filed in the public record via CM/ECF.

On March 27, 2020, Plaintiff’s counsel conferred with counsel for Defendant Electrolux Home Products Inc. (“Electrolux”) regarding this Motion. This instant Motion is **unopposed** by Defendant Electrolux.

Accordingly, for the reasons set forth above, Plaintiff respectfully requests that this Court maintain the unredacted version of the Memorandum of Law in Support of Motion for Class Certification and Certain Exhibits under seal until the conclusion of this litigation, at which time all copies shall be destroyed. The Declaration of Simon B. Paris, Esq., filed contemporaneously with Plaintiff’s Motion for Class Certification, identifies, by exhibit number, the exhibits being filed under seal to Plaintiff’s Motion for Class Certification. Furthermore, Exhibits 24, 40, and 41 are being filed with the Court under seal on a CD, as the file format does not permit filing on the ECF filing system.

A proposed Order is being submitted with this Motion.

WHEREFORE, the Court should permit the filing of the accompanying Memorandum of Law in Support of Motion for Class Certification and Certain Exhibits under seal.

Respectfully submitted,

DATE: March 27, 2020

By: /s/ Simon B. Paris  
Simon B. Paris  
Patrick Howard (PA ID #88572)  
Charles J. Kocher (PA ID #93141)  
**SALTZ, MONGELUZZI,  
& BENDESKY, P.C.**  
1650 Market Street, 52<sup>nd</sup> Floor  
Philadelphia, PA 19103  
Telephone: (215) 496-8282  
Fax: (215) 496-0999  
[sparis@smbb.com](mailto:sparis@smbb.com)  
[phoward@smbb.com](mailto:phoward@smbb.com)  
[ckocher@smbb.com](mailto:ckocher@smbb.com)  
**Attorneys for Plaintiff and  
Proposed Class**